

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

**Re: ECF Nos. 7449, 7468, 7712,  
7929, 8251, 8306, 8370, 8476, 8514,  
8586, 8711, 8781, 8851, 9017, 9385,  
9411, 9671, 10,590, 11,943, 11,969,  
12443, 12448, 12714, 13022**

(Jointly Administered)

**JOINT MOTION TO INFORM SETTLEMENT AND TO WITHDRAW  
MOTION FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM OF  
POST-PETITION EXECUTORY CONTRACT PAYMENTS [ECF NO. 7449]**

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), on behalf of the Commonwealth of Puerto Rico (the “Debtor”), pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017 and NextGen HealthCare, Inc. and Quality Systems, Inc. (the “Movants” and with the Debtor, the “Parties”) respectfully submit this joint motion to inform the Court that the Parties have consensually

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

resolved the *Motion for Payment of Administrative Expense Claim of Post-Petition Executory Contract Payments* [ECF No. 7449] (the “Motion”):<sup>2</sup>

1. On June 14, 2019, Movants filed the Motion requesting that the Court enter an order directing the Department of Health, an entity of the Debtor, to pay \$179,510.00 for post-petition services purportedly provided by Movants. See, Motion at p. 7.

2. The parties have requested several extensions of the briefing deadlines in an attempt to consensually resolve the matter.<sup>3</sup> After extensive negotiations, the Parties hereby inform the Court that they have reached an agreement which resolves the Motion.

3. In consideration of the above, Movants hereby withdraw the Motion.

Dated: June 4, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Luis C. Marini-Biaggi  
Luis C. Marini-Biaggi  
USDC No. 222301  
Email: [lmardini@mpmlawpr.com](mailto:lmardini@mpmlawpr.com)

/s/ Carolina Velaz-Rivero  
Carolina Velaz-Rivero  
USDC No. 300913  
Email: [cvelaz@mpmlawpr.com](mailto:cvelaz@mpmlawpr.com)

**MARINI PIETRANTONI MUÑOZ LLC**  
250 Ponce de León Ave.  
Suite 900  
San Juan, Puerto Rico 00918  
Tel: (787) 705-2171  
Fax: (787) 936-7494

/s/ Paul Hammer  
Paul Hammer  
USDC-PR 228306  
Attorney at Law  
2525 McCue Road, Box 117  
Houston, Texas 77056  
Ph:337-356-2945  
Email: [paulhammerlaw@gmail.com](mailto:paulhammerlaw@gmail.com)

*Attorney for Movants*

---

<sup>2</sup> The Financial Oversight and Management Board for Puerto Rico, as the Debtor’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), has authorized AAFAF to file this Joint Informative Motion on behalf of the Debtor.

<sup>3</sup> Most recently, the Court entered the *Order Granting Nineteenth Urgent Consented Motion for Extension of Deadlines* [ECF No. 12714], which gave parties 10 days after the Government lockdown was terminated to, among other things, inform the Court of an executed settlement agreement. *Id.* at ¶ 2.

*Attorneys for the Puerto Rico Fiscal  
Agency and Financial Advisory Authority*